

EXHIBIT B

1 Paul M. Levine, Esq. (007202)

2 **PAUL M. LEVINE, P.C.**

3 8502 E. Via de Ventura, Suite 230

4 Scottsdale, Arizona 85258

5 Telephone: (480) 302.4102

6 Facsimile: (480) 300.4984

7 plevine@pmlevinepc.com

8 *Attorney for Plaintiff/Counterclaimant*

9 *Labor Smart, Inc. and Third-Party Defendants*

10 **IN THE UNITED STATES DISTRICT COURT**
11 **IN AND FOR THE DISTRICT OF ARIZONA**

12 Labor Smart, Inc,

13 Plaintiff,

14 v.

15 Jason Tucker et al.,

16 Defendants.

17 Case No. 2:22-cv-00357-PHX-JJT

18 **DECLARATION OF JOE PAVLIK**

19 I, Joe Pavlik, hereby declare, under penalty of perjury, that the following is true and
20 correct.

21 1. I currently live in Cleveland, Ohio.
22 2. I am the primary caregiver for my parents. My father is 79 and my mother is 73.
23 3. My parents are both ill and I assist in their daily care. I see them on a daily basis.
24 4. I take my parents to all of their doctor's appointments, assist in preparation of their
25 meals and taking of all of their medications.

26 5. Traveling to Tucson, Arizona for the Settlement Conference would be a personal
hardship for both my parents and myself.

27 6. If I have to travel to Tucson, my parents will be left alone without anyone to care
28 for them, and their health and care would be compromised if I was not present.

7. My interests in this case align with those of Mr. Holley and Mr. Zarro, who I understand will personally be present at the Settlement Conference.

8. I am able to attend the Settlement Conference virtually and will do so.

9. I declare under penalty of perjury that the foregoing is true and correct.

DATED this 28th day of May, 2025.

/s/ Joe Pavlik
JOE PAVLIK